

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

ALI SADR HASHEMI NEJAD,

Defendant.

Case No. 18 Cr. 224 (ALC)

ORAL ARGUMENT REQUESTED

**DEFENDANT ALI SADR HASHEMI NEJAD'S NOTICE OF MOTION FOR
SUPPRESSION OF SEARCH WARRANT EVIDENCE AND FOR A *FRANKS* HEARING
(Pretrial Motion No. 8)**

Defendant Ali Sadr Hashemi Nejad, through counsel, respectfully moves pursuant to Federal Rule of Criminal Procedure 12(b)(3)(C), *Franks v. Delaware*, 438 U.S. 154 (1978), and the Fourth Amendment of the U.S. Constitution for a suppression hearing and to suppress evidence derived from the government's improper search warrants.

A proposed Order is attached.

Respectfully submitted,

/s/ Brian M. Heberlig

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